

# DOE-ID NEPA CX DETERMINATION

## Idaho National Laboratory

**SECTION A. Project Title:** Replace Motor Control Centers 670-E-10,11, 12, 13, 14, DC Panel 670-E-26, VFC 670-E-237

**SECTION B. Project Description:**

In order to meet seismic requirements, the five Motor Control Centers (MCCs) 670-E-10, 670-E-11, 670-E-12, 670-E-13, and 670-E-14 at the Advanced Test Reactor (ATR) (building Test Reactor Area [TRA]-670) need to be replaced. A test switch for the exhaust fan 670-HVE-18 would be installed, and the Variable Frequency Drive (VFD) 670-E-237, located next to the MCC 670-E-13, would be replaced. In addition, DC Panel 670-E-26 would be replaced with a new panel and new breakers, and the cabinet welded to it would be removed. The associated battery state-of-charge equipment would be moved to a separate seismically mounted enclosure. The Gas Control Loop Panel TF-E-2 would also be removed.

Project activities include installing support structures, removing and installing conduit, wiring and cables, and system testing.

**SECTION C. Environmental Aspects or Potential Sources of Impact:**

**Air Emissions:** Emissions typical of welding are expected. The welding emissions from the proposed action are not considered construction of a new stationary emission source. There is a potential for disturbing regulated asbestos containing material (RACM). All asbestos work must be conducted by properly trained personnel using appropriate abatement methods. Quantities of asbestos to be disturbed will be communicated to the Construction Environmental Support and Services (ES&S) representative in order to file the Asbestos Removal Notification Form (450.04). Asbestos work will not take place until the project has received approval from the Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAPs) Technical Point of Contact (TPOC).

**Disturbing Cultural or Biological Resources:** TRA-670 is eligible for nomination to the National Register of Historic Places. The project as described is exempted from cultural resource review (Idaho National Laboratory [INL] Cultural Resources Management Plan, Table 2, exemption 6 [Department of Energy Idaho Operations Office (DOE/ID)-10997 rev. 5]). Therefore, the project may proceed as planned.

**Generating and Managing Waste:** All waste will be transferred to Waste Generator Services (WGS) for proper disposition. Asbestos and/or lead based paint and polychlorinated biphenyls (PCBs) may have been used in the construction of the facility and could be disturbed by construction activities. Approved work controls will be in place to ensure that no airborne release of asbestos and lead will occur during removal activities. Project personnel will work with WGS to properly characterize, store, and dispose all waste according to established waste streams and laboratory procedures.

**Releasing Contaminants:** All chemicals utilized by this activity will be managed in accordance with laboratory procedures.

**Using, Reusing, and Conserving Natural Resources:** All materials would be reused and/or recycled where economically practicable and as accepted by the customer. All applicable waste would be diverted from disposal in the landfill where conditions allow. New equipment would meet either the Energy Star or Significant New Alternatives Policy (SNAP) requirements as appropriate (see <https://sftool.gov/green-products/0/hvacmechanical?agency=0>). In addition, the project would practice sustainable acquisition, as appropriate and practicable, by procuring construction materials that are energy efficient, water efficient, are bio-based in content, environmentally preferable, non-ozone depleting, have recycled content, or are non-toxic or less-toxic alternatives. Such purchases could include hydraulic fluid in accordance with BioPreferred requirements (<https://sftool.gov/green-products/0/lube-oil-hydraulic-fluid-grease?agency=0>).

**SECTION D. Determine the Recommended Level of Environmental Review (or Documentation) and Reference(s):** Identify the applicable categorical exclusion from 10 Code of Federal Regulation (CFR) 1021, Appendix B, give the appropriate justification, and the approval date.

For Categorical Exclusions (CXs), the proposed action must not: (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environmental, safety, and health, or similar requirements of DOE or Executive Orders; (2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment or facilities; (3) disturb hazardous substances, pollutants, contaminants, or Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted releases; (4) have the potential to cause significant impacts on environmentally sensitive resources (see 10 CFR 1021). In addition, no extraordinary circumstances related to the proposal exist that would affect the significance of the action. In addition, the action is not "connected" to other action actions (40 CFR 1508.25(a)(1) and is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1608.27(b)(7)).

**References:** 10 CFR 1021, Appendix B, B2.5 "Facility safety and environmental improvements"

**Justification:** Project activities are consistent with 10 CFR 1021, Appendix B, B2.5 "Safety and environmental improvements of a facility (including, but not limited to, replacement and upgrade of facility components) that do not result in a significant change in the expected useful life, design capacity, or function of the facility and during which operations may be suspended and then resumed. Improvements include, but are not limited to, replacement/upgrade of control valves, in-core monitoring devices, facility air filtration systems, or substation transformers or capacitors; addition of structural bracing to meet earthquake standards and/or sustain high wind

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loading; and replacement of aboveground and belowground tanks and related piping, provided that there is no evidence of leakage, based on testing in accordance with applicable requirements (such as 40 CFR part 265, "Interim Status Standards for Owners and Operators Hazardous Waste Treatment, Storage, and Disposal Facilities" and 40 CFR part 280, "Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks"). These actions do not include rebuilding or modifying substantial portions of a facility (such as replacing a reactor vessel)."

Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act)  Yes  No

Approved by Jack Depperschmidt, DOE-ID NEPA Compliance Officer on: 11/24/2014